

Louisiana Department of Environmental Quality (LDEQ)

Office of Environmental Services

STATEMENT OF BASIS

**US Army JRTC & Fort Polk
Fort Polk, Vernon Parish, Louisiana
Agency Interest Number: 8994
Activity Number: PER20070002
Proposed Permit Number: 2960-00010-V4**

I. APPLICANT

Company:
US Army JRTC & Fort Polk
6661 Warrior Trail, Office of the Garrison Commander
Fort Polk, Louisiana 71459-5339

Facility:
US Army JRTC & Fort Polk
6661 Warrior Trail
Fort Polk, Vernon Parish, Louisiana

II. FACILITY AND CURRENT PERMIT STATUS

Fort Polk encompasses approximately 98,000 acres of Department of Defense property, with intensive use of 100,000 acres of U.S. Forest Service property. The installation consists of two separate noncontiguous posts; the Main Post and the Peason Ridge Training Area. There are two cantonment areas in the Main Post: North Fort and South Fort.

Fort Polk serves as the headquarters for the JRTC and its tenants, including the Second Armored Cavalry Regiment, the Warrior Brigade and the 42nd Field Artillery Brigade. JRTC's mission is to provide light infantry training and special operations to elements of the U.S. Army, U.S. Navy, U.S. Marine, U.S Air Force and foreign armed services.

In support of this mission, Fort Polk operates a number of air emission sources. A brief description of each source is provided below.

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Boilers and Furnaces

Presently 68 boilers with heat capacities greater than or equal to 1 MMBtu/hr are operated at Fort Polk. These boilers provide steam for several locations such as the central energy plants, warehouses, motor pool buildings, and the Baynes-Jones Army Community Hospital. The fuel used in these boilers is natural gas, although several boilers are capable of using diesel as an emergency backup fuel.

Generators

Fort Polk currently operates 77 diesel, gasoline, or natural gas fired emergency electric generators. The generators range in size from 3 kW to 800 kW and are stationary.

Miscellaneous Internal Combustion Sources

One natural gas fired chiller operates at the Central Energy Plant. There are four diesel driven deluge pumps located at the airfield (Bldg 4264) for fire suppression. Also engine testing is conducted for troubleshooting rebuilt engines used in military vehicles. Engine testing operations are conducted in Building 4388.

Storage Tanks

Tanks used to store organic liquids at Fort Polk are typically horizontal fixed roof tanks. This category encompasses both underground storage tanks (USTs) and aboveground storage tanks (ASTs). Fort Polk is currently permitted to operate 25 USTs with capacities ranging from 500 to 400,000 gallons and 120 ASTs with capacities ranging from 50 to 15,000 gallons. Liquids stored in these tanks include gasoline, diesel, JP-8, used oil, kerosene, and liquefied natural gas.

Fuel Dispensing Operations

There are currently 29 permitted bulk and retail fuel dispensing areas at Fort Polk which are used to provide fuel for military vehicles, privately owned vehicles, and aircraft. Gasoline is mainly dispensed into privately owned and General Service Administration vehicles from Army and Air Force Exchange Service retail service stations. Diesel and JP-8 fuels are dispensed into military equipment, vehicles, and aircraft from various field locations such as the Transportation Motor Pool refueling site on Avenue K and the Airfield Bulk Refueling Site located on Texas Avenue.

Two bulk fuel loading racks are also operated at Fort Polk. Loading rack operations are defined as those fuel dispensing stations where fuel is bulk loaded into tank trucks for dispensing at another location. The trucks transport the fuel to military vehicles, tactical vehicles, large equipment, aircraft, and other tanks.

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Degreasing Operations

There are approximately 100 degreasers located at Fort Polk. Solvent is stored in a remote tank and subsequently used to remove grease or grease-like substances from various types of parts. Spent solvent from parts washers used on the installation is reclaimed at the HAZMART using solvent distillation.

Surface Coating Operations

Surface coating operations are permitted at five locations at Fort Polk, where coatings are applied to a variety of equipment. Surface coating materials include those necessary to achieve corrosion protection, camouflage schemes, and so on. To control particulate matter emissions from spray booths, Fort Polk utilizes dry filters. For smaller operations, coatings may be applied by spray can or brush.

Paint Gun Cleaning

Paint gun cleaning is permitted at three locations at Fort Polk. Paint guns used for spray painting are disassembled and the components are cleaned. Hand cleaning or soaking of the paint guns and associated equipment in a solvent is occasionally required. Routine paint gun cleaning is accomplished using a waste minimizing system that recycles the spent solvent for reuse.

Landfill Operations

Two inactive landfill sites, Mill Creek and Chaffee Road, are located at Fort Polk. The Mill Creek Landfill operated from 1950 to 1986. It encompasses approximately 400 acres and is comprised of one 30-acre landfill site with several trench-and-fill type units scattered throughout. Wastes disposed in the Mill Creek Landfill include paint wastes, medical (including infectious) wastes, municipal wastes, and construction debris. The estimated average waste acceptance rate was approximately 12,000 tons per year.

The Chaffee Road Landfill was operated from 1984 to 1993. The Chaffee Road Landfill is a trench-and-fill type unit encompassing approximately 24 acres. According to previous environmental surveys, this landfill contains approximately 135,000 tons of municipal and domestic wastes. The estimated average waste acceptance rate was approximately 15,000 tons per year.

Wastewater Treatment Operations

Two wastewater treatment facilities are operated at Fort Polk. The South Fort Polk treatment area has a design flow rate of 3.8 million gallons/day, and the North Fort Polk treatment area has a design flow rate of 1.4 million gallons/day.

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Munitions Detonation

Types of explosives used include RDX (Hexahydro-1,3,5-trinitro-1,3,5-triazine), TNT (2,4,5-Trinitrotoluene), Dynamite Gelatin and Black Powder. Disposal of ordnance is managed through detonation or burning at the Explosive Ordnance Disposal range.

Fugitives

Fugitive VOC emissions may be generated from two fuel recyclers at Fort Polk. One of the fuel recyclers is designed to recycle gasoline and the other is designed to recycle JP-8. These units are stationary units located at the K Avenue fuel dispensing station.

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application was submitted on September 12, 2007, requesting a Part 70 operating permit for Fort Polk.

Project

With this modification, Fort Polk requests the incorporation of several emission sources and insignificant activities. These sources include:

- One new boiler at the Consolidated Library Education Facility (EPN 4082), and
- Three replacement boilers at BJACH (EPNs 4083, 4084, and 4085).

Fort Polk also requests the replacement of several Energy Plant package boilers with new units of the same size and fuel type, and incorporation into the Title V permit of several small (<10 MMBtu/hr) external combustion sources, which include:

- Replacement of 14.645 MMBtu/hr Energy Plant boiler at Building 1172 (EPN 4001)
- Replacement of 6.277 MMBtu/hr Energy Plant boiler at Building 1628 (EPN 4003)
- Replacement of 16.75 MMBtu/hr Energy Plant boiler at Building 1941 (EPN 4006)
- Replacement of 10.461 MMBtu/hr Energy Plant boiler at Building 2271 (EPN 4008)
- Replacement of 3.29 MMBtu/hr boiler at Building 1569 (EPN 4041)
- Replacement of 3.1 MMBtu/hr boiler at Building 4374 (EPN 4042)
- Replacement of 2.1 MMBtu/hr boiler at Building 2070 (EPN 4048)
- Replacement of 1.26 MMBtu/hr boiler at Building 1454 (EPN 4067)
- Replacement of 1.35 MMBtu/hr boiler at Building 330 (EPN 4071)

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- Replacement of two 1.0 MMBtu/hr boiler at Building 3350 (EPNs 4058 and 4059)
- Replacement of 1.0 MMBtu/hr boiler at Building 8466 (EPN 4072)
- Add 3.29 MMBtu/hr boiler at Building 1455 (EPN 4189)
- Add 1.732 MMBtu/hr boiler at Building 3020 (EPN 4191)
- Add 1.0 MMBtu/hr boiler at Building 2273 (EPN 4193)
- Add 2.009 MMBtu/hr boiler at Building 270 (EPN 4194)
- Add two 2.4 MMBtu/hr boilers at Aviation Hangar A (EPNs 4195 and 4196)

Additionally, Fort Polk requests the following reconciliations be included in the Title V Permit:

- Relocation of diesel fueling operations at TMP Site #3, Building 3400 (EPNs 7036 and 20012) to Shoppette #3, Building 7000
- Remove fueling operations at TMP Site #5, Bulding 2913 (EPNs 20005 to 20010 and 22003)
- Remove fueling operations at CUBIC facility, Building 8407 (EPNs 7044 and 20154)
- Add fueling operations at CUBIC facility, OPSGRP CAI (EPNs 7054 and 20181)
- Remove four Used Oil tanks (EPNs 20001, 20002, 20003 and 20004)
- Remove four small (<10MMBtu/hr) boilers (EPNs 4011, 4012, 4013 and 4054)
- Increase bulk fuel throughput of JP-8 at Avenue K facility (EPN 22010)
- Change one Shoppette #3 storage tank (EPN 9203) from a gasoline tank to a diesel storage tank
- Remove fuel-dispensing operations from Building 1725 and Building 4919 (EPNs 7001, 9280, 9281, 9282, 7002, 9197, 9198 and 9199) once the two new AAFES facilities are operational.

Proposed Permit

Permit 2960-00010-V4 will be the renewal and minor modification of Part 70 operating permit 2960-00010-V3 for Fort Polk.

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Permitted Air Emissions

Estimated emissions in tons per year are as follows:

| Pollutant | Before | After | Change |
|------------------|--------|--------|---------|
| PM ₁₀ | 15.60 | 15.10 | - 0.50 |
| SO ₂ | 11.63 | 13.61 | + 1.98 |
| NO _x | 260.77 | 266.93 | + 6.16 |
| CO | 97.39 | 101.33 | + 3.94 |
| VOC | 108.36 | 88.98 | - 19.38 |

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (Tons/yr):

| Pollutant | Before | After | Change |
|----------------------------|--------|-------|--------|
| Formaldehyde | - | 0.05 | + 0.05 |
| n-Hexane | 4.54 | 2.41 | - 2.13 |
| Benzene | 0.71 | 0.24 | - 0.47 |
| Ethyl benzene | 0.47 | 0.13 | - 0.34 |
| Toluene | 2.40 | 0.35 | - 2.05 |
| Xylene | 2.37 | 1.14 | - 1.23 |
| Chloroform | 0.14 | 0.24 | + 0.10 |
| Methyl chloride | - | 0.04 | + 0.04 |
| Tetrachloroethylene | 0.05 | 0.02 | - 0.03 |
| Vinyl chloride | 0.02 | 0.02 | - |
| Hexamethylene diisocyanate | 0.03 | 0.03 | - |
| Methyl ethyl ketone | 3.54 | 0.09 | - 3.45 |
| n-Butyl alcohol | 0.11 | 0.08 | - 0.03 |
| Cresol | 0.01 | 0.01 | - |
| Methyl isobutyl ketone | 0.17 | 0.09 | - 0.08 |

Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (Tons/yr):

| Pollutant | Before | After | Change |
|-----------|--------|-------|--------|
| Lead | 0.02 | 0.37 | + 0.35 |
| Zinc | - | 0.02 | + 0.02 |
| Cobalt | 0.03 | 0.03 | - |
| Ammonia | - | 0.44 | + 0.44 |
| Total | | 0.86 | |

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

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Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | | Description | LAC 33:III.Chapter | | | | | | | | | | | | | | | | | | |
|---------|------------------------------|-------------|--------------------|-----|---|----|----|----|------|------|------|------|------|------|------|------|------|-----|-----|----|-----|
| UNF1 | | Fort Polk | 5▲ | 509 | 9 | 11 | 13 | 15 | 2103 | 2115 | 2107 | 2123 | 2125 | 2121 | 2113 | 2131 | 2132 | 51* | 53* | 56 | 59* |
| EQT 3 | 2001 - Decreasing, Post-wide | | | | | | | | | | | | | | | | | 1 | 1 | 1 | 1 |
| EQT 4 | 3003 - Boiler, Bldg 4388 | | | | | | | | | | | | | | | | | 1 | 1 | 1 | 1 |
| EQT 459 | 4001 - Boiler, Bldg 1172 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 6 | 4002 - Boiler, Bldg 1172 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 462 | 4003 - Boiler, Bldg 1628 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 8 | 4004 - Boiler, Bldg 1628 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 460 | 4006 - Boiler, Bldg 1941 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 10 | 4007 - Boiler, Bldg 1941 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 461 | 4008 - Boiler, Bldg 2271 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 12 | 4009 - Boiler, Bldg 2271 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 13 | 4010 - Boiler, Bldg 2271 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 17 | 4022 - Boiler, Bldg 4509 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 18 | 4025 - Boiler, Bldg 4386 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 19 | 4026 - Boiler, Bldg 4386 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |
| EQT 20 | 4027 - Boiler, Bldg 4531 | | | | | | | | | | | | | | | | | 1 | 1 | 3 | 3 |

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| LAC 33:III.Chapter | | | | | | | | | | | |
|--------------------|-------------------------------------|----|-----|---|----|----|----|------|------|------|------|
| ID No.: | Description | 5▲ | 509 | 9 | 11 | 13 | 15 | 2103 | 2115 | 2125 | 2121 |
| EQT 128 | 8051 -Diesel Generator, MOUT | | | 1 | | 3 | | | | | |
| EQT 129 | 8052 -Diesel Generator, Cemetery 13 | | | 1 | | 3 | | | | | |
| EQT 130 | 8053 -Diesel Generator, Mill Creek | | | 1 | | 3 | | | | | |
| EQT 131 | 8054 -Diesel Generator, Peason West | | | 1 | | 3 | | | | | |
| EQT 132 | 8055 -Diesel Generator, Peason East | | | 1 | | 3 | | | | | |
| EQT 134 | 8057 -Diesel Generator, Cemetery 13 | | | 1 | | 3 | | | | | |
| EQT 135 | 8058 -Diesel Generator, Mill Creek | | | 1 | | 3 | | | | | |
| EQT 136 | 8059 -Diesel Generator, Peason West | | | 1 | | 3 | | | | | |
| EQT 137 | 8060 -Diesel Generator, Peason East | | | 1 | | 3 | | | | | |
| EQT 138 | 8061 -Nat Gas Generator, Bldg T-2 | | | 1 | | 3 | | | | | |
| EQT 141 | 8066 -Diesel Generator, Cemetery 12 | | | 1 | | 3 | | | | | |
| EQT 142 | 8067 -Diesel Generator, Cemetery 12 | | | 1 | | 3 | | | | | |
| EQT 143 | 8068 -Diesel Generator, Bldg 289 | | | 1 | | 3 | | | | | |
| EQT 144 | 8069 -Diesel Generator, Bldg 289 | | | 1 | | 3 | | | | | |
| EQT 145 | 8070 -Diesel Generator, DASR | | | 1 | | 3 | | | | | |
| EQT 477 | 8071 -Diesel Generator, Bldg 350 | | | 1 | | 3 | | | | | |
| EQT 478 | 8084 -Diesel Generator, NF Radar | | | 1 | | 3 | | | | | |
| EQT 479 | 8085 -Diesel Generator, Peason | | | 1 | | 3 | | | | | |

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|---------|-------------------------------------|--------------------|-----|---|----|----|----|------|------|------|------|------|------|------|------|------|-----|-----|----|
| | | 5▲ | 509 | 9 | 11 | 13 | 15 | 2103 | 2115 | 2107 | 2123 | 2125 | 2121 | 2113 | 2131 | 2132 | 51* | 53* | 56 |
| FUG 1 | 26001 -Fugitives, Gasoline Recycler | | | | | | | | | | | | | | | | | | |
| FUG 2 | 26002 -Fugitives, JP-8 Recycler | | | | | | | | 2 | | | | 1 | | | | | | |

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
Blank – The regulations clearly do not apply to this type of emission source.

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- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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Table 3. Explanation for Exemption Status or Non-Applicability of a Source

| ID No: | Requirement | Notes |
|---|---|--|
| 3003, 8001-8011, 8013, 8014, 8016- 8019, 8021-8062, 8064, 8066-8070, 24001-24005 | Emission Standards for Sulfur Dioxide [LAC 33:III.1502.A] | DOES NOT APPLY. The source emits and has the potential to emit less than 5 tons per year [LAC 33:III.1502.A.3] |
| Engines | | |
| 4001, 4002, 4006- 4009, 4070 | Emission Standards for Sulfur Dioxide [LAC 33:III.1503.C] | EXEMPT. Units emit less than 250 tons of SO ₂ per year. |
| Boilers | | |
| 4003, 4004, 4010, 4022, 4025-4027, 4030-4037, 4040- 4069, 4071-4074, 4080, 4081, 4087- 4105, 4107-4115 | Emission Standards for Sulfur Dioxide [LAC 33:III.1502.A] NSPS Subpart Dc -- Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c] | DOES NOT APPLY. The source emits and has the potential to emit less than 5 tons per year [LAC 33:III.1502.A.3] |
| Boilers | | |
| 4117-4125, 4127- 4131, 4133-4138. 4140-4150, 4152- | Emission Standards for Sulfur Dioxide [LAC 33:III.1502.A] | DOES NOT APPLY. The source emits and has the potential to emit less than 5 tons per year [LAC 33:III.1502.A.3] |

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| ID No: | Requirement | Notes |
|---|---|---|
| 4156, 4158-4165, 4167-4170, 4172- 4175, 4177-4185, 4187 | NSPS Subpart Dc -- Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c] | DOES NOT APPLY. Construction date before June 9, 1989 or maximum firing rate < 10 MM Btu/hr heat input. |
| Boilers | | |
| 9141-9144 40,000 gallon JP-8 Storage Tanks | NSPS Subpart Kb -- Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b] | Exempted from Controls. Vapor pressure < 0.75 psia. Recordkeeping per 40 CFR 60.116 (a) and (b). |
| | Storage of Volatile Organic Compounds [LAC 33:III.2103] | DOES NOT APPLY. Vapor pressure < 1.5 psia. |
| 20021, 20022, 20040, 20041, 20043-20045, 20050, 20051... | NSPS Subpart Kb -- Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b] | DOES NOT APPLY. Tanks were constructed prior to July 23, 1984 or volumes < 19,800 gallons. |

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Table 3. Explanation for Exemption Status or Non-Applicability of a Source

| ID No: | Requirement | Notes |
|--|---|--|
| 20170, 20171-20183, 20046-20049, 20139-20141, 20160, 20046-20049, 20139-20141, 20160, 20053, 20157 | Storage of Volatile Organic Compounds [LAC 33:III.2103] | DOES NOT APPLY. Vapor pressure < 1.5 psia. |
| JP-8, Diesel, and Used Oil Storage Tanks | | |
| 9197-9199, 9201-9203, 9280-9282, 9284-9294, 20052, 20158, 20159 | NSPS Subpart K -- Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110] | DOES NOT APPLY. Tanks were constructed prior to June 11, 1973 or volumes < 40,000 gallons. |
| Gasoline Tanks | NSPS Subpart Ka -- Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a] | DOES NOT APPLY. Tanks were constructed prior to May 18, 1978 or volumes < 420,000 gallons. |
| 10,000-12,000 gal | NSPS Subpart Kb -- Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b] | DOES NOT APPLY. Tanks were constructed prior to July 23, 1984 or volumes < 19,800 gallons. |

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| ID No: | Requirement | Notes |
|---|---|---|
| | NSPS Subpart K -- Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110] | DOES NOT APPLY. Tanks were constructed prior to June 11, 1973 or volumes < 40,000 gallons. |
| 20042, 20128, 20134, 20161 Gasoline Tanks ≤ 5000 gal | NSPS Subpart Ka -- Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a] NSPS Subpart Kb -- Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b] Gasoline Handling [LAC 33:III.2131] | DOES NOT APPLY. Tanks were constructed prior to May 18, 1978 or volumes < 420,000 gallons. DOES NOT APPLY. Tanks were constructed prior to July 23, 1984 or volumes < 19,800 gallons. EXEMPT. Tanks located in attainment parish. |
| 20032 Gasoline Tank 250 gal | NSPS Subpart K -- Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110] NSPS Subpart Ka -- Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a] | DOES NOT APPLY. Tank was constructed prior to June 11, 1973 or volume < 40,000 gallons. DOES NOT APPLY. Tank was constructed prior to May 18, 1978 or volume < 420,000 gallons. |

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Table 3. Explanation for Exemption Status or Non-Applicability of a Source

| ID No: | Requirement | Notes |
|---|--|--|
| | NSPS Subpart Kb -- Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b] Gasoline Handling [LAC 33:III.2131] | DOES NOT APPLY. Tank was constructed prior to July 23, 1984 or volume < 19,800 gallons. EXEMPT. Tank located in attainment parish. |
| | Storage of Volatile Organic Compounds [LAC 33:III.2103] | DOES NOT APPLY. Tank volume < 250 gallons. |
| 22002, 22009, 22010 Loading Racks | Loading of Volatile Organic Compounds [LAC 33:III.2107] | DOES NOT APPLY. Throughput < 20,000 gallons per day. |
| 24002, 24003, 24004, 24005 Diesel Pumps | Standards of Performance for Stationary CI ICE [40 CFR 60 Subpart III] | EXEMPT. Engines constructed before 2005. |
| 24001 Natural Gas Chiller | Standards of Performance for Stationary SI ICE [40 CFR 60 Subpart JJJJ] | EXEMPT. Engine constructed before 2006. |
| 26001 Fugitives, MOGAS Recycler | Fugitive Emission Control [LAC 33:III.2121] | DOES NOT APPLY. Facility not a petroleum refinery, natural gas processing plant, synthetic organic chemical manufacturer, methyl tertiary butyl ether manufacturer, or a polymer manufacturer. |

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Table 3. Explanation for Exemption Status or Non-Applicability of a Source

| ID No: | Requirement | Notes |
|---|---|---|
| 25001, 26001, 26002 | Waste Gas Disposal [LAC 33:II.2115] Solvent Reclaimer, MOGAS and JP-8 Recycler | EXEMPT per LAC 33:III.2115.H.1.c VOC < 100 lbs in any continuous 24-hour period. |
| 7003, 7024, 7029, 7031, 7037, 7039, 7045, 7048, 7052, 7053, 7054 | Stage II Vapor Recovery Systems for Control of Vehicle Refueling Emissions at Gasoline Dispensing Facilities [LAC 33:III.2132] | DOES NOT APPLY. Facility not in affected parish. |
| | MOGAS Fuel Dispensing | |
| 17001, 17011, 17014, 17016, 17017 | National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [NESHAP Subpart HHHHHH] Surface Coating | EXEMPT. Facility owned by the Armed Forces of the United States. |

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

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Prevention of Significant Deterioration/Nonattainment Review

PSD does not apply.

Streamlined Equipment Leak Monitoring Program

| Unit or Plant Site | Program Being Streamlined | Stream Applicability | Overall Most Stringent Program |
|--------------------|---------------------------|----------------------|--------------------------------|
| Fort Polk | - | - | - |

MACT Requirements

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations. Prevention of Significant Deterioration (PSD) does not apply.

This facility was a major source of toxic air pollutants (TAPs) upon promulgation of LAC 33:III.Chapter 51 (December 20, 1991). The facility was modified and became a minor source of TAPs, but remains subject to LAC 33:III.Chapter 51.

Air Quality Analysis

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

A permit shield was not requested.

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VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air

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Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO_2) – An oxide of sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III, Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.